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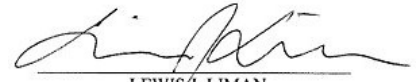
September 16, 2020

Via ECF

The Honorable Judge Lewis J. Liman
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street – Courtroom 15C
New York, NY 10007

Plaintiff shall move for default by September 30, 2020. An initial pretrial conference is scheduled for October 14, 2020 at 10 a.m. Parties are directed to dial into the Court's teleconference line at 888-251-2909, Access Code 2123101, and follow the necessary prompts.

SO ORDERED. 9/17/2020.



LEWIS J. LIMAN
United States District Judge

**Re: Gavel v. Wow Payments LLC et al, No. Index No. 1:20-cv-03475-LJL
Consent Motion to Stay and Extend Time to File for Default Judgment**

Dear Honorable Judge Liman,

This Firm has recently been retained to represent Defendants WOW Payments LLC and Eugene Gold in the above-referenced matter. We write to request, under Federal Rule of Civil Procedure 6(b) and this Court's inherent authority to control the disposition of cases on its docket, to stay and extend the time for Plaintiff to make her motion for a default judgment until September 30, 2020. We have conferred with Plaintiff's counsel, who consents to this motion. As records indicates, on September 8, 2020, this Court granted Plaintiff's request to make a motion for a default judgment and ordered that Plaintiff make her motion by September 18, 2020.

A stay is needed because this firm has just been retained by Defendants and, therefore, will require time to investigate all defenses and/or options in this action, including whether to make a motion to vacate any default. A stay is also appropriate because counsel for Plaintiff and Defendants have initiated explorative discussions about the possibility of settlement.

An extension is required to preserve Plaintiff's right to make her motion for a default judgment in case parties fail to reach a settlement or Defendants fail to file responsive pleadings by September 30, 2020.

This is Defendants' and Plaintiff's first request for the relief sought herein. We thank Your Honor for the Court's consideration.

Respectfully submitted,

/s/ Oleg A. Mestechkin
Oleg A. Mestechkin, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2020, I served the foregoing document via electronic filing with the Clerk of the Court using the CM/ECF filing system.

/s/ Nancy Lam

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